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HR Staffing Consultants, LLC and
Upstream Healthcare Management of
New Jersey, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

HR STAFFING CONSULTANTS, LLC and
UPSTREAM HEALTHCARE MANAGEMENT
OF NEW JERSEY, LLC,

Plaintiffs,

v.

RICHARD BUTTS,

Defendant.

CIVIL ACTION

DOCKET NO. 2:15-cv-03155-KM-SCM

NOTICE OF EMERGENCY MOTION FOR AN
ORDER TO SHOW CAUSE WITH TEMPORARY RESTRAINTS

TO: Mr. Richard Butts
6112 Ambleside Drive
Wilmington, NC 28409
richardb.butts@gmail.com

—and—

3012 Constitution Avenue
B9-267
Bayonne, NJ 07002

—and—

c/o CarePoint Health Management Associates, LLC
10 Exchange Place
Jersey City, NJ 07302
Richard.Butts@CarePointHealth.org

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned will apply to the above-named Court at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey, seeking an Order to Show Cause with Temporary Restraints restraining Defendant Richard Butts from violating the non-complete, non-solicitation, and confidentiality provisions of his Employment Agreement with Plaintiff HR Staffing Consultants, LLC and setting a hearing date to convert those temporary restraints into a preliminary injunction.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Plaintiffs shall rely upon the enclosed Memorandum of Law and Declaration of Christopher Howard.

By: /s/Anthony Argiropoulos
/s/Thomas Kane
/s/Robert M. Travisano
Anthony Argiropoulos
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Robert M. Travisano
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Newark, New Jersey 07102
(973) 642-1900

Attorneys for Plaintiffs
HR Staffing Consultants, LLC and
Upstream Healthcare Management of
New Jersey, LLC

Dated: May 7, 2015

CERTIFICATION OF SERVICE

I, Anthony Argiropoulos, Esquire, hereby certify that on this date I caused a true and correct copy of the foregoing Notice of Emergency Motion for an Order to Show Cause with Temporary Restraints, including all supporting papers, as well as the Summons and Complaint, to be served upon Defendant Richard Butts (on behalf of whom no counsel has yet entered an appearance) at the following locations and by the following means:

By Email To:

richardb.butts@gmail.com

—*and*—

Richard.Butts@CarePointHealth.org

By Hand Delivery (via *both* Courier *and* Process Server) To:

6112 Ambleside Drive
Wilmington, NC 28409

—*and*—

3012 Constitution Avenue
B9-267
Bayonne, NJ 07002

—*and*—

c/o CarePoint Health Management Associates, LLC
10 Exchange Place
Jersey City, NJ 07302

By: /s/Anthony Argiropoulos
Anthony Argiropoulos

Dated: May 7, 2015